

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

BRADLEY J. SCHAUFENBUEL; et al.,)
)
 Plaintiffs,) Case No. 09-CV-1221
 v.)
)
 INVESTFORCLOSURES FINANCIAL,) Judge Leinenweber
 L.L.C.; et al.,) Magistrate Judge Nolan
)
 Defendants.)

SIXTH SET OF INTERROGATORIES – PRELIMINARY INJUNCTION PHASE

Plaintiffs' Class, by and through their attorneys, Thurston Law Offices, P.C. and Law Offices of Joel M Weiner, LLC, propound the following Sixth Set of Interrogatories to be answered under oath by Defendant, Darcey L. Martin ("Darcey") within 30 days after service hereof pursuant to Rule 33 of the Federal Rules of Civil Procedure ("F.R.C.P.").

DEFINITIONS AND INSTRUCTIONS

In connection with these Interrogatories, the following definitions apply when such are applicable:

1. "Identify" means: (a) with respect to an individual, to state the individual's name, last known address, social security number, last known telephone number, last known email address, last known employer, last known title of employment, and dates of employment; (b) with respect to an entity other than an individual, to state the entity's name and the address of the entity's principal place of business; (c) with respect to a document, to state the type of document, date of the document, author of the document, senders and receivers of the document and a summary of the contents of the document; and (d) with respect to a communication, to state: (i) whether the communication was oral, written or both written and oral; (ii) the identity of the individuals who were parties to the communication; (iii) the date(s) of the communication; (iv) the substance of the communication; (v) with respect to an asset, to state the type of asset, all owners including without limitation joint owners, ownership type (e.g. joint tenancy, partnership, etc.), its location, any associated account number, the current balance and/or value of the asset, and the source of funds for the asset; and (vi) the type or title of any document (e.g. memorandum, letter, note, etc.) that constitutes all or a part of any written communication.

2. "Person" or "persons" means any individual or entity, including, but not limited to partnerships, associations, corporations, or any other form of business or any body of government or instrumentality or subdivision thereof.

3. As used herein, "Related to" or "Relating to" means referring to, recording, reflecting upon or in any way logically or factually connected with the matters discussed.

4. "You," "Your" and/or "Darcey" refers to Darcey L. Martin.

5. "Complaint" means the currently pending Complaint filed in this action.

6. "Answer" shall mean any and all Answers, Affirmative Defenses or other responsive pleadings to the currently pending Complaint on file with the Court.

7. "ROI Mexico" means Realty Opportunities International S. de R.L. de C.V., Realty Opportunities International, ROI Mexico, Sands of Gold Estates and each of their predecessors, parent companies, subsidiaries, affiliated companies, successors in interest, and/or their members, shareholders, directors, officers, agents, representatives, and control group employees.

8. The term "Party" or "Parties" shall mean and include each and every Plaintiff and Defendant, collectively.

9. The term "Communication" means any oral, written or electronic transmission of information, opinion, belief, idea or statement, including, but not limited to, letters or correspondence, conversations, meetings, discussions, telephone calls, telegrams, telecopies, telexes, seminars, conferences, messages, notes, e-mails or memoranda.

10. The term "or" is meant to include the term "and" if that interpretation would call for the further disclosure of additional information, and vice versa.

11. The term "all" is meant to include the term "any" if that interpretation would call for the further disclosure of additional information, and vice versa.

12. Use of the singular shall be deemed to include the plural, and use of the masculine shall be deemed to include the feminine as appropriate and vice versa.

13. Unless stated otherwise, information requested by these Interrogatories is for the period January 1, 2000 to the present and continuing forward pursuant to F.R.C.P. 26(e).

14. Pursuant to F.R.C.P. 26(e), these Interrogatories shall be deemed continuing so as to require supplemental responses should you or your attorney

obtain further information between the time responses are served and the time of trial.

15. In answering these interrogatories, furnish not merely information available from your personal knowledge, but all information available to you, including information in the possession of your attorneys, agents, investigators, and all persons acting on your behalf. If you cannot answer the interrogatories in full after exercising due diligence to secure the information, so state and answer to the extent possible, specifying the reason for your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.

16. "Document" is used in the broadest possible sense and means, including without limitation all documents, copies of documents, correspondence, letters, telephone messages, voicemail messages, electronic mail ("email") messages, facsimiles / faxes, electronic files and documents, including without limitation spreadsheets, databases, Portable Document Format files, raw data, and attachments thereto. A draft or non-identical copy of a document, including an otherwise identical copy but for handwritten matter, is a separate document within the meaning of this term.

17. If you are producing electronic documents and/or email in lieu of a written response to these Interrogatories, you are instructed that if such information is stored in Microsoft Office 2003 or lesser format you shall produce it in its native format on CDs or DVDs readable by Microsoft Windows 2000 or greater. If the data is stored in another format, Defendants request that the information be produced in multi-page Adobe Portable Document Format (PDF) version 5.0 or greater on CDs or DVDs readable by Microsoft Windows 2000 or greater. Production of electronic data or documents shall be in compliance with The Sedona Conference® Cooperation Proclamation (July 2008) and/or any Standing Order of this Court on electronic discovery.

18. If any information requested by these Interrogatories is claimed to be immune from discovery on the grounds of privilege or otherwise:

- a. identify the communication or document or source of information;
- b. identify the person or persons making the communication or authoring the document and all persons receiving the documents;
- c. specify the type of privilege or other reason asserted for withholding the requested information;
- d. specify the basis for the assertion; and
- e. describe the withheld information to a degree sufficient to enable the court to decide if any such claim has been properly invoked.

INTERROGATORIES

INTERROGATORY NO. 1: Identify each person that supplied information to respond to these Interrogatories, indicating to which Interrogatory such person's information was responsive, as well as each person's employer, title, current residence address, date of birth, driver's license number and issuing state, and last four digits of their social security number, and, if different, give the full name, as well the current residence address, date of birth, driver's license number and issuing state, and last four digits of the social security number of the individual signing these answers.

ANSWER:

INTERROGATORY NO. 2: Did you invest in any of the following entities:

- (a) InvestForClosures Financial, L.L.C.
- (b) ROI Developers
- (c) InvestForClosures
- (d) InvestForClosures.com, LLC
- (e) InvestForClosures Ventures, LLC
- (f) Sands of Gold Escrow
- (g) Sands of Gold
- (h) ROI Financial
- (i) Realty Opportunities International Escrow 23
- (j) ROI Escrow
- (k) Realty Opportunities International S. de R.L. de C.V.
- (l) Realty Opportunities International
- (m) ROI Mexico
- (n) Sands of Gold Estates

ANSWER:

INTERROGATORY NO. 3: If your answer to Interrogatory No. 2 is anything other than an unqualified no, for each such investment:

- (a) Identify the entity in which you invested;
- (b) Identify the amount of your investment;
- (c) Identify the method of payment for such investment, including without limitation check, cash, wire transfer, credit card payment, payment through a broker or intermediary, etc.;
- (d) Identify whether you received a certificate or other document confirming your investment;
- (e) Identify the name of your principal contact at the entity for the investment;
- (f) Identify all documents you reviewed or considered prior to making your investment;
- (g) Identify whether you were repaid for the investment;
- (h) Identify the amount of any such repayment, including without limitation any interest you received;
- (i) Identify the method of such repayment;
- (j) Identify the entity that provided such repayment to you;
- (k) Identify the source of funds for such repayment to you; and
- (l) State whether you believe you have been repaid in full by the entity.

ANSWER:

INTERROGATORY NO. 4: Did you send March 31, 2008 Account Statements to investors via email? (See attached Exhibit A as examples)

ANSWER:

INTERROGATORY NO. 5: If your answer to Interrogatory No. 4 is anything other than an unqualified no, with respect to the Account Statements:

- (a) Identify the source of information for such Account Statements;
- (b) State whether you verified the information contained in those Account Statements;
- (c) Identify the person or persons who were responsible for preparing such Account Statements;
- (d) If your answer to subpart (c) above is you, state why you were the person responsible for preparing such Account Statements;
- (e) State whether you notified Sterling Trust and other intermediaries of the information contained in the Account Statements;
- (f) Identify all investors that indicated that the Account Statements were inaccurate, if any; and
- (g) Identify the basis upon which the "warrants" were accounted for in the Account Statements.

ANSWER:

INTERROGATORY NO. 6: In what capacity were you sending ROI Updates via email to investors such as those attached hereto as Group Exhibit B?

ANSWER:

INTERROGATORY NO. 7: For the ROI Updates you were sending to investors, please state the following:

- (a) Identify the source of information in such ROI Updates;
- (b) State whether you verified the information contained in those ROI Updates;

- (c) Identify the person or persons who were responsible for preparing such ROI Updates;
- (d) If your answer to subpart (c) above is you, state why you were the person responsible for preparing such ROI Updates;
- (e) Identify all persons and entities who are mentioned or referenced in the ROI Updates contained in Group Exhibit B, including without limitation "Frank," "Jim," "Darcey," "a board member," "Jorge," the "Mexican Bank," "Gregoria," "Adam," "Mike," "Mark," "Group Leaders," "Michael," "Zac," "Leo," "John," "Robert," "Cooper," "Poncho," "Poncho's Daughter," "the bank," "political contacts" in Mexico, and "officials";
- (f) Identify the date of the first ROI Update you sent to investors and the date of the last ROI Update you sent to investors;
- (g) Why you were sending these ROI Updates to investors; and
- (h) Why the ROI Updates didn't identify the last names or full entity names of the persons or entities mentioned or referenced therein.

ANSWER:

INTERROGATORY NO. 8: Other than any repayment of your investment, have you been compensated in any way, including without limitation cash, stock, warrants, bonuses and/or promises of compensation, stock, warrants, bonuses, by the entities listed in Interrogatory No. 2 above?

ANSWER:

INTERROGATORY NO. 9: If your answer to Interrogatory No. 8 is anything other than an unqualified no, please state what form and amount of compensation you have been given by any of the entities listed in Interrogatory No. 2 above.

ANSWER:

PLAINTIFFS' CLASS

By: /s/ Robert C. Thurston
One of Their Attorneys

Thurston Law Offices, P.C.
Robert C. Thurston
A.R.D.C. No. 6209353
10469 Bethel Avenue
Huntley, IL 60142
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Email: tj@thurstonlawpc.com

Law Offices of Joel M Weiner, LLC
Joel M. Weiner
579 N 1st Bank Drive Suite 150
Palatine, IL 60067-8102
Phone: 847-654-3105
Fax: 847-358-7165
Email: jweiner@jweinerlaw.com

CERTIFICATE OF SERVICE

I, Robert C. Thurston, an attorney, hereby certify that pursuant to F.R.C.P. 5(a) I served this Sixth Set of Interrogatories – Preliminary Injunction Phase by sending a copy via email to all members of the Service List below except where noted otherwise on April 30, 2009.

By: /s/ Robert C. Thurston
Robert C. Thurston

SERVICE LIST

Attorneys For Defendants
InvestForClosures Financial, L.L.C.;
InvestForClosures.com, LLC;
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ECF FILER

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cdunlop@ccdlaw.com
rbaker@ccdlaw.com
glynott@ccdlaw.com
ECF FILER

From: Darcey Martin [mailto:darcey.martin@d2dsolutions.com]
Sent: Monday, April 14, 2008 8:43 AM
To: Patton, Jonathan E SSgt USAF ACC 23 AMXS/MXADF
Cc: 'Jim Bourassa'
Subject: Jonathan Patton Account Review 03.31.08.xls

EXHIBIT A

<<...>>

Dear Jonathan,

I have attached your Account Statement. Please reply via email directly back to let me know if these amounts agree with your records, and if the calculations are accurate based on your own review. If our records do not agree with yours, please let us know as soon as possible.

Also, is the address correct, on the spreadsheet I received it has a different email address.

Best Regards,

Darcey L. Martin, CCFC
Financial Specialist

Realty Opportunities International
ROI Mexico: Your Gateway to Paradise(r)

phone: 863-875-1220

Jonathan Patton
 724 Jonestown Rd. Apt. B
 Winston Salem, NC 27103

Account #: 204048

Account Type: Cash

Term Length: 2 years

Rate Period: Annual

Nominal Annual Rate: 14.000%

AMORTIZATION SCHEDULE - U.S. Rule (no compounding)

Date	Loan	Payment	Interest	Interest	Principal	-----	Balance Due	-----
			Accrued	Paid	Paid	Interest	Principal	Total
Loan 12/11/2006	40,000.00		0.00	0.00	0.00	0.00	40,000.00	40,000.00
Loan 3/31/2008	0.00		7,287.67	0.00	0.00	7,287.67	40,000.00	47,287.67
Grand Totals		40,000.00	0.00	7,287.67	0.00	0.00		

An open balance of 47,287.67 still remains.

From: Darcey Martin <darcey.martin@d2dsolutions.com>
Subject: Liam Angelini Account Review 03.31.08.xls
To: "Liam Angelini" <langlum@yahoo.com>
Cc: "Jim Bourassa" <jb@roimexico.com>
Date: Friday, May 23, 2008, 5:16 AM

<<...>>

Dear Liam,

I have attached your Account Statement. Please reply via email directly back to let me know if these amounts agree with your records, and if the calculations are accurate based on your own review. If our records do not agree with yours, please let us know as soon as possible.

Best Regards,

Darcey L. Martin, CCFC
Financial Specialist

Realty Opportunities International
ROI Mexico: Your Gateway to Paradise(r)

phone: 863-875-1220

Liam Angelini
452 SW 158 Tr.
204
Pembroke Pines, FL 33027-1118

Account # 104143

Account Type: Cash

Term Length: 5 years

Compound Period: Annual

Nominal Annual Rate: 9.000%

AMORTIZATION SCHEDULE - Normal Amortization, 360 Day Year

	Date	Invest	Balance	Date	Return	Interest	Net Change	Balance
Invest	7/21/2004	35,000.00					35,000.00	35,000.00
alance Date	3/31/2008				0.00	13,192.89	13,192.89	48,192.89
Grand Totals		35,000.00			0.00	0.00	13,192.89	48,192.89

An open balance of 48,192.89 still remains.

TJ Thurston

From: Darcey Martin [darcey.martin@d2dsolutions.com]
Sent: Tuesday, April 29, 2008 9:11 AM
To: Jim Bourassa
Cc: Herink, Paul J Mr CIV USA AMC
Subject: FW: Paul Herink Account Review 03.31.08.xls
Attachments: Paul Herink Account Review 03.31.08.xls

Jim,

Please respond to Paul regarding his comment below.

Darcey

-----Original Message-----

From: Herink, Paul J Mr CIV USA AMC
Sent: Tuesday, April 29, 2008 8:55 AM
To: 'darcey.martin@d2dsolutions.com'
Subject: FW: Paul Herink Account Review 03.31.08.xls

Calculations appear to be correct. This needs to be reported to Sterling Trust Co, my IRA custodian, who then has to report it to the IRS.

-----Original Message-----

From: Darcey Martin [mailto:darcey.martin@d2dsolutions.com]
Sent: Tuesday, April 29, 2008 9:48 AM
To: Herink, Paul J Mr CIV USA AMC
Cc: 'Jim Bourassa'
Subject: Paul Herink Account Review 03.31.08.xls

<<....>>

Dear Paul,

I have attached your Account Statement. Please reply via email directly back to let me know if these amounts agree with your records, and if the calculations are accurate based on your own review. If our records do not agree with yours, please let us know as soon as possible.

Best Regards,

Darcey L. Martin, CCFC
Financial Specialist

Realty Opportunities International
ROI Mexico: Your Gateway to Paradise(r)

phone: 863-875-1220

Paul Herink
291 Frank Applegate Road
Jackson, NJ 08527-4215

Account # 104111

Account Type: IRA

Term Length: 5 years

Compound Period: Annual

Nominal Annual Rate: 10.900%

AMORTIZATION SCHEDULE - Normal Amortization, 360 Day Year

	Date	Invest	Balance	Date	Return	Interest	Net Change	Balance
Invest	12/22/2003	30,476.60					30,476.60	30,476.60
Balance Date	3/31/2008				0.00	17,018.31	17,018.31	47,494.91
Grand Totals		30,476.60		0.00	0.00	17,018.31	47,494.91	

An open balance of 47,494.91 still remains.

From: Darcey Martin <darcey.martin@d2dsolutions.com>
Subject: FW: ROI Mexico - Update coming...
To: oohbehave50@yahoo.com
Date: Friday, August 8, 2008, 10:20 AM

EXHIBIT B

From: Frank Sanchez [mailto:francissanchez@live.com]
Sent: Friday, August 08, 2008 8:03 AM
To: investor@roimexico.com
Subject: ROI Mexico - Update coming...

Dear Investor,

I am working on a more complete update, but yes, we have made several avenues of progress and are having to decide which direction to take. Everything is moving along, only not at the time table that I would like. Also, we are doing our due diligence on 2 companies that want to buy out the whole project and negotiating with 3 companies that are offering to take over the master funding of the project with better terms than we have already.

I'm pushing all avenues forward as fast and hard as possible to check out their ability to deliver and so far they all verifiable. We have made an agreement to make a final decision one way or the other by the 15th, next week. At that point the entire investor base will be notified and we move forward from there.

Francis "Frank" Sanchez
Founder and Chief Executive Officer

Realty Opportunities International/ InvestForClosures Financial
ROI Mexico: Live your dreams on the Sands of Gold

815-814-4364 Main Office
847-977-5501 Cell
815-425-9337 Fax
fs@roimexico.com

darcey.martin@d2dsolutions.com

CC: francisxaviersanchez@gmail.com, jimdonaldbourassa@gmail.com

Sent: 2/19/2009 3:06:42 A.M. Pacific Standard Time

Subj: ROI Update 02.18.09

Please find the 02.18.09 update below.

Mexican Bank—Jorge is in Monicello or Monteray or somewhere will not be in office until 2.23, Monday, we have set up a meeting for 02.23.09 at 4pm CST. Frank, Jim, Darcey, and a board member will be on call.

Action Item: Will re-send agenda and confirm appt for Monday by Friday of this week. ***Will be contacting political connections regarding potential synergy with bank to help move funding along. We will need 5-6 letters, Looking to send Robert all letters by the end of the week. Also will continue to make calls.***

Here are some things that come to mind when thinking how political connections can help this process.

1. Are they familiar with Jorge and Gregoria you were working with.
2. Are they familiar with the 35M application process (I don't know the official name of this)
3. Importance of this project for the region
 - a. Money in the locals hands with the purchasing of the land from individuals-exercising options
 - b. Jobs created from work that needs to be done-infrastructure
 - c. Positive PR for the region
 - d. Focal point of being a "Green Project"
 - e. Focal point of being world class development/golf course designed by XXXX (I can't remember name)
 - f. Focal point of exclusiveness of clientele that will be visiting/living there
 - g. Creation of additional business opportunities to support the development.

Adam—Adam to work out deal with Mike prior to entering our JV, conference call to happen this week or next week. Once into other agreement, will be able to address our JV Agreement.

Action Item: Jim to send latest versions of agreements to board for review.

Option Contracts--- It is a very different set up in Mexico. Group leaders handle for many individuals

Action Item: *Group Leaders(9-12) calls need to be made, ongoing, still making contacts.*

Michael---Is in Europe this week, returning on Monday the 23rd. Have set up a meeting to discuss outline sent last week, Monday 2.23.09—11am CST. Frank, Jim, Darcey, and a board member will be on call.

Action Item: *Send out confirmation of meeting and meeting agenda by Friday for Monday's Meeting.*

Construction company— Making progress on ongoing outline and straw-man agreement(will be determined after Adam agreement). Have been emailing back and forth with Zac. No huge pressure since we need bank and Adam to be handled first.

Leo- Leo making up a structured payment plan to give 12K back. Leo has replied looking for acct number. Emailing back and forth, trying to get money to us. Expecting check this week or next.

John's Proposal email will be sent out for review.

Adjourned.

*Darcey L. Martin, CCFC
Financial Specialist
email: darcey.martin@d2dsolutions.com
blog: www.debt2dreams.wordpress.com*

phone: 863-875-1220
fax: 863-875-1143

Check out Darcey's latest on her Money Blog, add it to your RSS feeds, it is a must read in this economic environment.

From: darcey.martin@d2dsolutions.com
CC: francisxaviersanchez@gmail.com, jimdonaldbourassa@gmail.com
Sent: 2/22/2009 1:30:51 A.M. Pacific Standard Time
Subj: ROI Update 02.21.09

Please find the 02.21.09 update below.

Mexican Bank—we have set up a meeting for 02.23.09 at 4pm CST. Frank, Jim, Darcey, and Mark will be on call, waiting to hear confirmation on agenda

Action Item: Will be contacting political connections regarding potential synergy with bank to help move funding along. We will need 5-6 letters, Darcey to draft letters, Frank to review, Robert to Translate. Frank to send Darcey the list on Saturday. Also will continue to make calls.

Here are some things that come to mind when thinking how political connections can help this process.

1. Are they familiar with Jorge and Gregoria you were working with.
2. Are they familiar with the 35M application process (I don't know the official name of this)
3. Importance of this project for the region
 - a. Money in the locals hands with the purchasing of the land from individuals-exercising options
 - b. Jobs created from work that needs to be done-infrastructure
 - C. Positive PR for the region
 - d. Focal point of being a "Green Project"
 - e. Focal point of being world class development/golf course designed by XXXX (I can't remember name)
 - f. Focal point of exclusiveness of clientele that will be visiting/living there
 - g. Creation of additional business opportunities to support the development.

Adam—Adam to work out deal with Mike prior to entering our JV, conference call to happen this week. Once into other agreement, will be able to address our JV Agreement. Should have more information after call happens on Monday (2/23).

Action Item: Looking to get the final agreement sent to board for review.

Option Contracts--- It is a very different set up in Mexico. Group leaders handle for many individuals

Action Item: Group Leaders(9-12) calls need to be made, ongoing, still making contacts.

Michael--- Have set up a meeting to discuss outline sent last week, Monday 2.23.09—1:30pm CST. Frank, Jim, Darcey, and Mark will be on call. This meeting has been confirmed by Michael.

Action Item: Have meeting on Monday, will know more after this meeting.

Construction company— Making progress on ongoing outline and straw-man agreement(will be determined after Adam agreement). Have been emailing back and forth with Zac. No huge pressure since we need bank and Adam to be handled first.

Leo- Leo making up a structured payment plan to give 12K back. Leo has replied looking for acct number. Emailing back and forth, trying to get money to us. Still nothing have sent another email on 2/19.

Preferred Share/ROI Mexico Bond Conversion—protection for Investors. Mark will be following up on steps that will need to be taken to do this.

Adjourned.

Darcey L. Martin, CCFC
Financial Specialist
email: darcey.martin@d2dsolutions.com
blog: www.debt2dreams.wordpress.com

phone: 863-875-1220
fax: 863-875-1143

Check out Darcey's latest on her Money Blog, add it to your RSS feeds, it is a must read in this economic environment.

From: darcey.martin@d2dsolutions.com
CC: jimdonaldbourassa@gmail.com, francisxaviersanchez@gmail.com
Sent: 2/28/2009 9:14:50 A.M. Pacific Standard Time
Subj: ROI Update 02.28.09

Please find the 02.28.09 update below.

Mexican Bank—Meeting went well, follow-up/thank you has been sent, they responded Friday saying they are reviewing and they will let us know. Waiting to hear about setting up site visit for first or second week in March. Will have a “Town Hall” meeting for all land owners, contractors, political contacts and associates to give an update on the project and to find out if there are any synergies that we can utilize immediately. Darcey drafted memo, sent to Frank. Now getting translated by Robert to get sent out. Once we get a date of site visit, will get a time and location for meeting to update all interested parties.

Action Item: Will be working contacts down there to get the word out with the memo. Once a date is planned will be setting up additional meetings in Mexico with political contacts to see if any synergies exist that can assist in moving the process along. Will send the translated memo to officials.

Adam—Adam to work out deal with Mike prior to entering our JV. Once into other agreement, will be able to address our JV Agreement. Mike’s deal could be falling through and Adam could be moving forward with ours sooner. Adam is now pursuing both deals and will keep us posted.

Action Item: Jim is working with Adam to button up Agreement. Also to see if Cooper has been contacted by Adam.

Option Contracts--- It is a very different set up in Mexico. Group leaders handle for many individuals. Group Leaders(9-12). Will set up meeting(s) for when down in Mexico to do site review with bank.

Michael--- Meeting went well, follow-up/thank you has been sent. Have invited Michael to site review to discuss how him and the bank can work together to finance the project. Will follow up once we get the date of bank meeting.

John—have sent a note to John catching him up on the Michael meeting, John responded.

Action Item: Will be setting up meeting with John early in the week.

Adan— sent him an email (2/27) outlining the process for funding that we received from Michael.

Action Item: Will follow up later next week if we don't hear from him.

Construction company— Making progress on ongoing outline and straw-man agreement(will be determined after Adam agreement). Have been emailing back and forth with Zac. No huge pressure since we need bank and Adam to be handled first.

Leo- Leo making up a structured payment plan to give 12K back. Leo has replied looking for acct number. Emailing back and forth, trying to get money to us. Still nothing have sent another email on 2/26.

Action Item: Will continue trying to contact.

Preferred Share/ROI Mexico Bond Conversion—protection for Investors. Mark will be working on setting this up.

Website Update—done 2.27.09; will shoot for 1-2 per month.

Adjourned.

Darcey L. Martin, CCFC
Financial Specialist
email: darcey.martin@d2dsolutions..com
blog: www.debt2dreams.wordpress.com

phone: 863-875-1220
fax: 863-875-1143

Check out Darcey's latest on her Money Blog, add it to your RSS feeds, it is a must read in this economic environment.

From: darcey.martin@d2dsolutions.com
CC: jimdonaldbourassa@gmail.com, francisxaviersanchez@gmail.com
Sent: 3/4/2009 4:56:27 P.M. Pacific Standard Time
Subj: ROI Update 03.04.09

Please find the 03.04.09 update below.

Mexican Bank—Jorge was to call Frank Wednesday afternoon. Waiting to hear about setting up site visit for first or second week in March. Will have a “Town Hall” meeting for all land owners, contractors, political contacts and associates to give an update on the project and to find out if there are any synergies that we can utilize immediately. Once we get a date of site visit, will get a time and location for meeting to update all interested parties.

Action Item: Will be following up with Jorge on Thursday. Once a date is planned will be setting up additional meetings in Mexico with political contacts to see if any synergies exist that can assist in moving the process along. Get Poncho’s Daughter’s email for contacts. More contacts being updated. Will send more memos to officials.

Adam—Adam to work out deal prior to entering our JV. Once into other agreement, will be able to address our JV Agreement. Adam is now pursuing both deals and will keep us posted. Looks like Cooper is out, now working on another avenue for the cash. Finalized JV Agreement.

Action Item: Need to make a step by step process on how everything will work.

Option Contracts--- It is a very different set up in Mexico. Group leaders handle for many individuals. Group Leaders(9-12). Will set up meeting(s) for when down in Mexico to do site review with bank.

Michael--- Meeting went well, follow-up/thank you has been sent. Have invited Michael to site review to discuss how him and the bank can work together to finance the project. Will follow up once we get the date of bank meeting.

John—have sent a note to John catching him up on the Michael meeting, have exchanged emails and phone calls. He has been traveling but should be able to talk by end of week.

Action Item: Will be setting up meeting with John by end of the week.

Adan— sent him an email (2/27) outlining the process for funding that we received from Michael. He is no longer an option. Closed.

Construction company— Making progress on ongoing outline and straw-man agreement(will be determined after Adam agreement). Have been emailing back and forth with Zac. No huge pressure since we need bank and Adam to be handled first.

Leo- Leo making up a structured payment plan to give 12K back. Leo has replied looking for acct number. Emailing back and forth, trying to get money to us. Still nothing have sent another email on 2/26.

Action Item: Will continue trying to contact.

Preferred Share/ROI Mexico Bond Conversion—protection for Investors. Mark will be working on setting this up.

Website Update—done 2.27.09; will shoot for 1-2 per month.

Adjourned.

Darcey L. Martin, CCFC
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Check out Darcey's latest on her Money Blog, add it to your RSS feeds, it is a must read in this economic environment.

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

BRADLEY J. SCHAFENBUEL; et al.,)
Plaintiffs,)
v.)
INVESTFORCLOSURES FINANCIAL,)
L.L.C.; et al.,)
Defendants.)
)
)
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Case No. 09-CV-1221
Judge Leinenweber
Magistrate Judge Nolan

**SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS– PRELIMINARY
INJUNCTION PHASE**

Plaintiffs' Class, by and through their attorneys, Thurston Law Offices, P.C. and Law Offices of Joel M Weiner, LLC, hereby requests that Defendant, Darcey L. Martin ("Darcey"), produce documents identified below at Thurston Law Offices, P.C., 10469 Bethel Avenue, Huntley, IL 60142 within 30 days after service hereof pursuant to Rule 34 of the Federal Rules of Civil Procedure ("F.R.C.P.").

DEFINITIONS AND INSTRUCTIONS

1. "Person" or "persons" means any individual or entity, including, but not limited to partnerships, associations, corporations, or any other form of business or any body of government or instrumentality or subdivision thereof.
2. As used herein, "Related to" or "Relating to" means referring to, recording, reflecting upon or in any way logically or factually connected with the matters discussed.
3. "You," "Your" and/or "Darcey" refers to Darcey L. Martin.
4. "Complaint" means the currently pending Complaint filed in this action.
5. "Answer" shall mean any and all Answers, Affirmative Defenses or other responsive pleadings to the currently pending Complaint on file with the Court.
6. "ROI Mexico" means Realty Opportunities International S. de R.L. de C.V., Realty Opportunities International, ROI Mexico, Sands of Gold Estates and each of their predecessors, parent companies, subsidiaries, affiliated companies, successors in interest, and/or their members, shareholders, directors, officers, agents, representatives, and control group employees.

7. The term "Party" or "Parties" shall mean and include each and every Plaintiff and Defendant, collectively.

8. The term "Communication" means any oral, written or electronic transmission of information, opinion, belief, idea or statement, including, but not limited to, letters or correspondence, conversations, meetings, discussions, telephone calls, telegrams, telecopies, telexes, seminars, conferences, messages, notes, e-mails or memoranda.

9. The term "or" is meant to include the term "and" if that interpretation would call for the further disclosure of additional information, and vice versa.

10. The term "all" is meant to include the term "any" if that interpretation would call for the further disclosure of additional information, and vice versa.

11. Use of the singular shall be deemed to include the plural, and use of the masculine shall be deemed to include the feminine as appropriate and vice versa.

12. Unless stated otherwise, information requested by these Requests is for the period January 1, 2000 to the present and continuing forward pursuant to F.R.C.P. 26(e).

13. Pursuant to F.R.C.P. 26(e), these Requests shall be deemed continuing so as to require supplemental responses should you or your attorney obtain further information between the time responses are served and the time of trial.

14. In answering these Requests, furnish not merely information available from your personal knowledge, but all information available to you, including information in the possession of your attorneys, agents, investigators, and all persons acting on your behalf. If you cannot answer the Requests in full after exercising due diligence to secure the information, so state and answer to the extent possible, specifying the reason for your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.

15. "Document" is used in the broadest possible sense and means, including without limitation all documents, copies of documents, correspondence, letters, telephone messages, voicemail messages, electronic mail ("email") messages, facsimiles / faxes, electronic files and documents, including without limitation spreadsheets, databases, Portable Document Format files, raw data, and attachments thereto. A draft or non-identical copy of a document, including an otherwise identical copy but for handwritten matter, is a separate document within the meaning of this term.

16. If you are producing electronic documents and/or email in lieu of a written response to these Requests, you are instructed that if such information is stored in Microsoft Office 2003 or lesser format you shall produce it in its native

format on CDs or DVDs readable by Microsoft Windows 2000 or greater. If the data is stored in another format, Defendants request that the information be produced in multi-page Adobe Portable Document Format (PDF) version 5.0 or greater on CDs or DVDs readable by Microsoft Windows 2000 or greater. Production of electronic data or documents shall be in compliance with The Sedona Conference® Cooperation Proclamation (July 2008) and/or any Standing Order of this Court on electronic discovery.

17. If any information requested by these Requests is claimed to be immune from discovery on the grounds of privilege or otherwise:

- a. identify the communication or document or source of information;
- b. identify the person or persons making the communication or authoring the document and all persons receiving the documents;
- c. specify the type of privilege or other reason asserted for withholding the requested information;
- d. specify the basis for the assertion; and
- e. describe the withheld information to a degree sufficient to enable the court to decide if any such claim has been properly invoked.
- f. If you are producing electronic documents and/or email, Plaintiff/Defendants request that if such information is stored in Microsoft Office 2003 or lesser format you shall produce it in its native format on CDs or DVDs readable by Microsoft Windows 2000 or greater. If the data is stored in another format, Plaintiff/Defendants request that the information be produced in multi-page Adobe Portable Document Format (PDF) version 5.0 or greater on CDs or DVDs readable by Microsoft Windows 2000 or greater.

DOCUMENT REQUESTS

REQUEST NO. 1: All documents that you reviewed or support your responses to the Sixth Set of Interrogatories – Preliminary Injunction Phase served upon you.

RESPONSE:

REQUEST NO. 2: All correspondence, including without limitation all emails, exchanged between you and the following individuals and/or entities:

- (a) Francis X. Sanchez aka Frank Sanchez
- (b) James D. Bourassa aka Jim Bourassa
- (c) Scott D. Wessel

- (d) Deana M. Guidi
- (e) Daniel E. Fitzgerald aka Dan Fitzgerald
- (f) Scott Slagle
- (g) Tom Rodriguez
- (h) Wayne O'Day
- (i) Richard Sanchez
- (j) Salomon Sanchez
- (k) Mauricio Sanchez
- (l) Stewart Title Company
- (m) Sterling Trust Company

RESPONSE:

REQUEST NO. 3: All correspondence, including without limitation all emails, exchanged between you and any investor in any of the following entities:

- (a) InvestForClosures Financial, L.L.C.
- (b) ROI Developers
- (c) InvestForClosures
- (d) InvestForClosures.com, LLC
- (e) InvestForClosures Ventures, LLC
- (f) Sands of Gold Escrow
- (g) Sands of Gold
- (h) ROI Financial
- (i) Realty Opportunities International Escrow 23

- (j) ROI Escrow
- (k) Realty Opportunities International S. de R.L. de C.V.
- (l) Realty Opportunities International
- (m) ROI Mexico
- (n) Sands of Gold Estates

RESPONSE:

REQUEST NO. 4: All electronic files, including without limitation MS Office (Word, Excel, Powerpoint, Access, Publisher) files, PDF files, image (.jpg, .tif, .tiff, .gif, etc.) files and database files, you have relating to any of the entities listed in Request No. 3 and/or Playa Ventura, Mexico.

RESPONSE:

REQUEST NO. 5: All documents which evidence the members, officers, board of directors, agents, and/or representatives of any of the entities listed in Request No. 3.

RESPONSE:

REQUEST NO. 6: All documents which evidence the identity of investors of any of the entities listed in Request No. 3.

RESPONSE:

REQUEST NO. 7: All documents in your possession used or reviewed to create ROI Update emails, including without limitation those attached to the Sixth Set of Interrogatories – Preliminary Injunction Phase as Group Exhibit B.

RESPONSE:

REQUEST NO. 8: All documents evidencing your relationship, employment or capacity relating to any of the entities listed in Request No. 3 above.

RESPONSE:

REQUEST NO. 9: All documents relating to properties or assets obtained or purchased by any of the entities or persons listed in Request No. 3.

RESPONSE:

REQUEST NO. 10: All documents evidencing and/or verifying the values contained in the March 31, 2008 Account Statements sent by you via email to investors.

RESPONSE:

PLAINTIFFS' CLASS

By: /s/ Robert C. Thurston
One of Their Attorneys

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CERTIFICATE OF SERVICE

I, Robert C. Thurston, an attorney, hereby certify that pursuant to F.R.C.P. 5(a) I served this Sixth Request for Production of Documents – Preliminary Injunction Phase by sending a copy via email to all members of the Service List below except where noted otherwise on April 30, 2009.

By: /s/ Robert C. Thurston
Robert C. Thurston

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ECF FILER

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